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JUL 3 2019

CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

AFFIDAVIT

BY William P. Akins, a Postal Inspector with the United States Postal Inspection

Service (USPIS), being duly sworn, depose and state:

INTRODUCTION:

1. I am a Postal Inspector with the United States Postal Inspection Service, in Tucson, AZ, and have been employed as such since February of 2019. Since February of 2019, I have been stationed at the Tucson, Arizona office of the Phoenix Division. I attended the fourteen-week training course at the United States Postal Inspection Service Academy in Potomac, MD. There I received training related to violations of federal law including assaults, robberies, and criminal investigations of narcotics trafficking via the United States Mail. Prior to becoming a Postal Inspector, I was employed as a United States Border Patrol Agent for approximately 13 years. Throughout my law enforcement career, I have had extensive training and experience investigating a variety of criminal violations including controlled substances.

DESCRIPTION OF SUBJECT PARCEL:

2. This affidavit is made in support of an Application and Affidavit for Search Warrant for a United States Postal Service (USPS) Priority Mail Express parcel with Tracking Number EJ 064 028 514 US, bearing \$58.80 postage, postmarked from High Point, NC 27260 on June 24, 2019. It bears a return address of "Alex Ball, 1226 Rogar Street, High Point, NC 27263" and is addressed to "Jeffrey Ball, 417 E. 3rd Street, Douglas, AZ 85607". The article consists of a USPS white mailing box measuring approximately 12.3"x

15.25"x 3" and weighing approximately 3 pound 6 ounces. It is hereafter referred to as the "SUBJECT PARCEL".

**BACKGROUND ON USPS DRUG INTERDICTION IN SOUTHERN ARIZONA
AND THE USPS DRUG MAIL PROFILING PROGRAM:**

3. From my training, personal experience, and the collective experiences related to me by other Postal Inspectors who also specialize in investigations relating to the mailing of controlled substances and the proceeds from the sale of controlled substances, I am aware that the southern Arizona international border is a leading area for the entry of controlled substances from Mexico into the U.S. Based on the large quantities of controlled substances entering southern Arizona, controlled substances are frequently transported from southern Arizona via the United States Mail to areas across the United States, primarily to the large metropolitan areas in the eastern United States and Puerto Rico. It is also common for the proceeds from the sale of the controlled substances to be sent to southern Arizona via the United States Mail. By using the U.S. Mail to ship controlled substances, these drug traffickers put unknowing postal employees who handle and deliver those mailings at risk.
4. Based on the frequent use of the United States Mail for the shipment of controlled substances from southern Arizona, Postal Inspectors in Tucson routinely observe inbound mail articles for suspicious characteristics common to mailings of drug proceeds. While there are many characteristics that experienced inspectors look for, the most common characteristics found are:

- a. Suspected proceeds parcels are mailed from known drug destination areas, primarily the large metropolitan areas in the eastern half of the United States and Puerto Rico.
- b. The sender names and addresses on drug proceeds parcels routinely contain misspellings, incomplete, inaccurate, unauthorized and/or fictitious information.
- c. A tracking number is used to provide the trafficker the ability to track the parcel's progress to the point of delivery.
- d. The postage was paid with cash which leaves no trail identifying the mailer.

Parcels found to meet some or all of the suspicious characteristics described in subsections "a" through "d" of this paragraph are further investigated by Postal Inspectors.

INVESTIGATIVE DETAILS:

5. On June 25, 2019, during ongoing drug proceeds interdiction activities at Tucson, AZ, I observed the SUBJECT PARCEL at the USPS Tucson Processing and Distribution Center and found it had the following characteristics common to drug proceeds parcels, namely:
 - a. It was mailed from High Point, NC which is an area I know to be a destination for drug parcels and a source area for proceeds from the sale of those drugs.
 - b. The SUBJECT PARCEL bears a tracking number. From my experience, I know that nearly all drug and drug proceeds parcels bear

tracking numbers allowing the sender and receiver to track the progress of the shipment from origination to destination.

c. There were no telephone numbers listed on the mailing label for either the sender or addressee. In my experience, legitimate mailers who use the USPS Priority Mail Express expedited service regularly include telephone numbers in the spaces provided on the label because they paid a premium price for the service and want to be contacted to help facilitate a timely delivery should a problem arise. In my experience, Priority Mail Express parcels that I seized drugs and/or drug proceeds from bore either no telephone numbers or listed fictitious telephone numbers.

d. The postage of \$58.80 was paid with cash.

6. On June 25, 2019, I accessed "Thomson Reuters CLEAR" to check for records of the names and addresses listed on the SUBJECT PARCEL. Thomson Reuters CLEAR is an online service that provides an extensive collection of public records used primarily by corporate security departments and law enforcement agencies nationwide for investigative purposes. Both addresses were verified for mail delivery however, there were no records associating the sender or addressee names with the corresponding addresses listed on the parcel.
7. The SUBJECT PARCEL is a large box and does have the feel and weight typical of a bulk currency mailing. In my experience and the experience of other Inspectors we have seized suspected drug proceeds many times from

money orders or checks and not currency showing an attempt to eliminate possible narcotics contact and odors. In my experience, if drug proceeds were converted from currency to money orders, it would show an additional step to conceal the proceeds true origin and nature of its acquisition. This type of proceed transaction and concealment is referenced in 18 USC 1956.

8. Based on the facts set forth in this affidavit, I believe there is probable cause to show that the SUBJECT PARCEL contains controlled substances and/or proceeds from the sale of controlled substances, constituting evidence of violations of Title 21, United States Code, Sections 841 (a) (1), Possession with Intent to Distribute a Controlled Substance, and 843 (b), Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance.

9. Canine Examination:

- a. On June 27, 2019, at approximately 3:25 p.m., I met with Supervisory Border Patrol Agent Christopher Jbara of the United States Border Patrol and his narcotics canine partner Zora-E. Agent Jbara's canine is trained and certified to detect the odors of marijuana, heroin, cocaine, and methamphetamine and their derivatives. I placed the SUBJECT PARCEL in a cleared area for examination by Agent Jbara and Zora-E. Agent Jbara informed me at approximately 3:45 p.m. that Zora-E alerted to the SUBJECT PARCEL, indicating the presence of narcotics or a controlled substance, or other evidence with an odor of narcotics or a controlled substance within the parcel.

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10. This affidavit is submitted for the limited purpose of seeking authorization to search the SUBJECT PARCEL. Your Affiant has not set forth each and every fact known to him regarding the investigation.



William P. Akins
United States Postal Inspector

Subscribed and sworn to before me on
This 2nd day of July, 2019



Bruce G. Macdonald
UNITED STATES MAGISTRATE JUDGE

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ATTACHMENT A
DESCRIPTION OF PARCEL TO BE SEARCHED

SP: A white box with USPS Tracking Number EJ 064 028 514 US, bearing \$58.80 in postage, postmarked from High Point, NC 27260 on June 24, 2019. It bears a return address of "Alex Ball, 1226 Rogar St, High Point, NC 27263" and is addressed to "Jeffrey Ball, 417 E. 3rd Street, Douglas, AZ 85607." The parcel consists of a white cardboard shipping carton, weighing approximately 3 pounds, 6 ounces and measuring approximately 12.3" X 3" X 15.25."